

1 MELINDA HAAG (CABN 132612)
United States Attorney

2 MIRANDA KANE (CABN 150630)
Chief, Criminal Division

4 THOMAS A. COLTHURST (CABN 99493)
Assistant United States Attorney

5 150 Almaden Boulevard, Suite 900
6 San Jose, California 95113
7 Telephone: (408)-535-5065
Fax: (408)-535-5066
E-Mail: tom.colthurst@usdoj.gov

FOIA REQUESTED BY GE

8 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,) No. 10-00823-DLJ
15 Plaintiff,) No. 10-00932-DLJ
16 v.)
17 GUSTAVO COLIN LOPEZ,) STIPULATION FOR AUTHORIZATION
aka MICHAEL LOPEZ-FLORES,) TO PROVIDE SEALED PLEA
18 Defendant.) AGREEMENT TO DEFENSE COUNSEL

21 The defendant GUSTAVO COLIN LOPEZ (aka MICHAEL LOPEZ-FLORES),
22 represented by Vicki H. Young, Esq., and the government, represented by Thomas A. Colthurst,
23 Assistant United States Attorney, respectfully request that the Court authorize the government to
24 provide counsel for the defendant in this matter with a copy of the plea agreement entered into
25 between the government and Manual Villa and filed under seal on August 2, 2011. It is
26 anticipated that Villa could be a witness in a sentencing hearing in this matter and that the
27 defendant's counsel would be entitled to the plea agreement as Giglio material. The parties also
28

1 agree that the plea agreement will remain under seal in the Clerk's office.

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3 SO STIPULATED:

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5 Dated: November 14, 2012

/S/
6 Thomas A. Colthurst
Assistant United States Attorney

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8 Dated: November 14, 2012

/S/
9 Vicki H. Young, Esq.
Attorney for Defendant

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11 Accordingly, for good cause shown, the Court HEREBY ORDERS that a copy of the plea
12 agreement for Manual Villa filed on August 2, 2011, may be provided to counsel for the
13 defendant in *United States V. Gustavo Colin Lopez*, and *United States v. Michael Lopez-Flores*,
14 subject to the following:

15 IT IS FURTHER ORDERED that the plea agreement shall not be disseminated or
16 disclosed to anyone other than the named defendants or their counsel, or the staff of their counsel
17 (secretaries, paralegals, clerical staff and attorneys employed by counsel and/or counsel's law
18 firm and nonemployees engaged by counsel and under counsel's supervision who assist in
19 counsel's representation of one of the named defendants), except upon the express authorization
20 of this Court. Information obtained from the plea agreement may be discussed with third parties
21 only to the extent necessary for the investigation and preparation of a named defendant's defense,
22 *provided* that in no case shall the discussion of such information involve the disclosure to any
23 third party of the document that is the source of the information or that the source of the
24 information is a plea agreement or other document filed under seal.

25 IT IS FURTHER ORDERED that the plea agreement that is currently under seal shall
26 remain sealed after the attorneys have been provided copies.

27 IT IS FURTHER ORDERED that any attorney receiving the plea agreement is not to
28 disclose any information therein other than to prepare for trial and for the defense of his/her

1 client.

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4 DATED: FFEB DG

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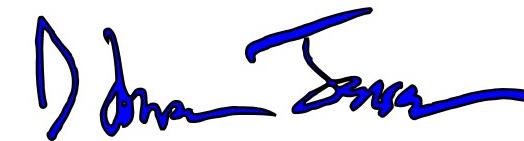
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THE HONORABLE D. LOWELL JENSEN
United States District Judge